

Exhibit D

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

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4 JEFFREY M. GOLDMAN,

5 Plaintiff, DEPOSITION UPON
6 vs. ORAL EXAMINATION
7 OF:
8

SOL GOLDMAN INVESTMENTS DR. DORON KATZ
9 LLC, SOLIL MANAGEMENT, LLC
and JANE H. GOLDMAN,

10 Defendants.
11 -----x

12 T R A N S C R I P T of the above-entitled matter,
13 being taken pursuant to Superior Court Rules of Civil
Practice and Procedure, by and before Deborah J.
14 Arnnone, a Certified Court Reporter of the State of
15 New Jersey, with all parties appearing via ZOOM
16 VIDEOCONFERENCE on Thursday, October 14, 2021 at
17 12:00 in the afternoon.

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20
21
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2

1 A P P E A R A N C E S:

2 JOSEPH & KIRSCHENBAUM, LLP

3 32 Broadway, Suite 601

4 New York, NY 10004

5 BY: LEAH SELIGER, ESQ.

6 Attorneys for the Plaintiff

7

8 ANSELL, ZARO, GRIMM & AARON, ESQS.

9 1500 Lawrence Avenue, CN7807

10 Ocean, NJ 07712

11 BY: JOSHUA BAUCHNER, ESQ.

12 Attorneys for the Defendants

13

14 ALSO PRESENT: Reena Malhorta, Inhouse counsel for
15 the Defendants

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3 EXAMINATIONS PAGE

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5 DR. DORON KATZ 4

6 DIRECT EXAMINATION BY MR. BAUCHNER 4

7 CROSS EXAMINATION BY MS. SELIGER 55

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9 E X H I B I T S

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11 NO. DESCRIPTION PAGE

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14 INFORMATION REQUESTED

15 Page Line

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1 THE REPORTER: We are on the record. My
2 name is Debi Arnnone. I am a certified court
3 reporter, licensed by the State of New Jersey. My
4 license number is 1346. I will now swear in the
5 witness.

6

7 DR. DORON KATZ, 177 N. Dean Street, Suite 203,
8 Englewood, New Jersey 07631, having been duly sworn
9 according to law testified as follows:

10

11 DIRECT EXAMINATION BY MR. BAUCHNER:

12 Q. First question, Dr. Katz, have you ever
13 been deposed before?

14 A. Have I been deposed before? I was
15 involved in one court case about seven years ago I
16 think.

17 Q. Okay. So, Dr. Katz, the rules of court
18 are very particular with respect to virtual
19 depositions, and I know it's in the middle of the
20 day, and I apologize for the intrusion. The
21 plaintiff denominated you as a person with knowledge,
22 but there's actually a bar against using any
23 electronic devices or doing anything else while
24 you're being deposed, so I'm going to try to be as
25 quick as I can with you, but I do ask for your

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1 undivided attention, please.

2 **A. So here's the pile of stuff on my desk**
 3 **that has to get through and about 50 patients that**
 4 **need phone calls, but let's just do this quickly.**

5 **Q.** I'm doing my best and your attention is
 6 appreciated.

7 Were -- do you -- did your office
 8 provide to you a copy of the exhibits? It was
 9 e-mailed last night.

10 **A. Last night?**

11 **Q.** Yes.

12 **A. Let me just look real quickly.**

13 **Q.** Absolutely. Thank you. I'm trying to
 14 make it as quick as possible for you, sir.

15 **A. Who did it come from?**

16 **Q.** It would have come from my office.

17 Probably Rahool.

18 **A. Let me just look. Hold on.**

19 MS. SELIGER: I think it came from
 20 Denise actually.

21 MR. BAUCHNER: Oh, okay.

22 **Q.** It might have come from Denise Sweet.
 23 She's the court reporting service.

24 MS. SELIGER: No. Denise Muzzio.

25 **A. I don't think I got this.**

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1 MR. BAUCHNER: Why don't we go off the
 2 record for this exercise.

3 (An off-the-record discussion was held.)

4 MR. BAUCHNER: We can go back on the
 5 record.

6 BY MR. BAUCHNER:

7 **Q.** All right. Dr. Katz, now that we
 8 located the exhibits and, again, thank you and
 9 counsel for your efforts in that regard.

10 Just quick ground rules, Dr. Katz, as
 11 you know you're under oath, so we just request
 12 truthful testimony of course. Everything we're
 13 saying is as well being taken down by the court
 14 reporter who you see here, and as a courtesy to her
 15 so that we have a clean record, I just ask that you
 16 allow me to finish my question before you answer. I
 17 will, of course, extend the same courtesy to you.

18 From time to time you might hear
 19 counsel, Ms. Seliger, issue an objection. Unless she
 20 specifically for some reason directs you not to
 21 answer, she's just making an objection to make a
 22 record, so you should feel free to -- after she
 23 voices her objection to answer my question, and that
 24 will move things on very very quickly so we can get
 25 you out of here; all right?

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1 **A. Yeah.**

2 **Q.** All right. Any other questions before
 3 we proceed?

4 **A. Let's do it.**

5 **Q.** Okay. Thank you very much.

6 THE REPORTER: Excuse me. I have a
 7 Reena Malhorta trying to get in. Is that somebody --
 8 MR. BAUCHNER: She's counsel for the
 9 company. Please.

10 (Reena Malhorta, Esq. entered the zoom
 11 meeting.)

12 **Q.** While we're doing that, if you could
 13 just turn to Exhibit 1 which is the First Amended
 14 Complaint, and I'm going to direct you to Paragraph
 15 31.

16 MS. SELIGER: Josh, I'm so sorry to
 17 interrupt but will Ms. Malhorta be turning on her
 18 camera?

19 MR. BAUCHNER: Reena, you need to turn
 20 on your camera if you're going to participate. Thank
 21 you.

22 BY MR. BAUCHNER:

23 **Q.** Okay. Dr. Katz, Exhibit 1, Paragraph
 24 31. Please let me know when you have that. It's on
 25 page six if that helps.

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1 **A. I have it.**

2 **Q.** Excellent. In addition to -- for the
 3 record Paragraph 31 states, in addition to the
 4 COVID-19 related risks resulting from Plaintiff's
 5 age, he has many underlying conditions that doctors
 6 and experts agree cause people to be particularly
 7 susceptible to COVID-19 and much more likely to die
 8 as a result of catching the virus.

9 What are plaintiff's many underlying
 10 conditions that make him particularly susceptible to
 11 COVID-19?

12 **A. The biggest one is probably age. I**
 13 **would say age. Yeah, age probably number one, and**
 14 **then after that -- after that probably -- yeah, I**
 15 **would say age, hypertension.**

16 **Q.** So it says, in addition to the COVID-19
 17 related risks resulting from his age.

18 In addition to his age, what are the
 19 many underlying conditions?

20 **A. Weight. Weight, age, hypertension, and**
 21 **then I would say -- I'd go one step beyond that and**
 22 **say his wife is incredibly obese and out of shape.**

23 **Q.** But that wouldn't make him susceptible
 24 to COVID-19, it would make his wife susceptible,
 25 correct?

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<p style="text-align: center;">9</p> <p>1 A. I mean everybody was susceptible.</p> <p>2 Q. That's true. Everyone's susceptible to</p> <p>3 COVID. Right. So is he particularly susceptible</p> <p>4 more so than anyone else?</p> <p>5 A. Based on age.</p> <p>6 Q. He's more susceptible infection based on</p> <p>7 age?</p> <p>8 A. He's more susceptible to getting sicker</p> <p>9 and dying based on age, weight and comorbidity,</p> <p>10 hypertension. I think he has -- I don't know if he</p> <p>11 has -- let me go look at his labs quickly. Hold on</p> <p>12 one second.</p> <p>13 Q. Doctor, I'm sorry, you can't do that.</p> <p>14 Dr. Katz, you can't look at his labs because we</p> <p>15 don't -- we don't have them, and any document you</p> <p>16 look at we need to see.</p> <p>17 A. Okay. No problem.</p> <p>18 Q. All right.</p> <p>19 A. I would say age number one, number two</p> <p>20 hypertension, number three -- yeah, I would say age,</p> <p>21 hypertension and then family.</p> <p>22 Q. Well, his family doesn't make him</p> <p>23 susceptible, correct?</p> <p>24 A. Makes them susceptible.</p> <p>25 Q. Right. Right. But the allegation as we</p>	<p style="text-align: center;">11</p> <p>1 read to you paragraph --</p> <p>2 A. Let me just add a bit of -- one more</p> <p>3 statement is that at this point -- I don't know if</p> <p>4 this is the right time for it -- but at this point</p> <p>5 there was no vaccine, and there wasn't a single</p> <p>6 30-year old that was -- that's the wrong terminology.</p> <p>7 There are very many -- majority of 35-year old men</p> <p>8 with six packs -- I'm saying it slowly -- with BMIs</p> <p>9 of 22 that were not going to work. It was pretty</p> <p>10 commonplace that almost nobody was going to work</p> <p>11 except for doctors.</p> <p>12 Q. When you say, at this time, what time</p> <p>13 are you referring to, sir?</p> <p>14 A. At the time of the letter that --</p> <p>15 that -- at the time that I wrote the letter for the</p> <p>16 patient suggesting that he probably would be safer</p> <p>17 for him not to go to work.</p> <p>18 Q. And what time was that, sir?</p> <p>19 A. Let me look. Can I look at that?</p> <p>20 Q. No.</p> <p>21 A. I can't recall it.</p> <p>22 Q. If you recall it, you'll recall it, but</p> <p>23 I do have the letter. I could show it to you.</p> <p>24 A. Yeah. I think somewhere -- somewhere</p> <p>25 between June and October of 2020. I looked at it</p>
<p style="text-align: center;">10</p> <p>1 just read is regarding his susceptibility, correct?</p> <p>2 A. Yeah. I mean for him I would say age.</p> <p>3 Q. Okay. Thank you. Thank you.</p> <p>4 Paragraph 32 states, because of</p> <p>5 Plaintiff's underlying conditions, including his age</p> <p>6 and ongoing symptoms caused by his proximity to the</p> <p>7 September 11, 2001 terrorist attack on the World</p> <p>8 Trade Center, Plaintiff's doctor advised him to</p> <p>9 continue him to work from home and take strict</p> <p>10 measures to avoid exposure to the virus.</p> <p>11 Do you see that?</p> <p>12 A. Let me just -- let me change also -- I</p> <p>13 also say weight, weight and blood pressure. He's</p> <p>14 over -- his -- by -- by US standards he's overweight.</p> <p>15 Close to obese.</p> <p>16 Q. So, Dr. Katz, just for the record, I'm a</p> <p>17 New Yorker as well, but we have to talk slowly for</p> <p>18 the court reporter. And I realize you're trying to</p> <p>19 move through this. I used to get yelled at by court</p> <p>20 reporters in court all the time to slow down, so I'm</p> <p>21 sensitive to it.</p> <p>22 A. I just want to amend my statement to the</p> <p>23 age and his weight being close to a BMI that's close</p> <p>24 to obesity but definitely in the overweight category.</p> <p>25 Q. Okay. And then do you recall I just</p>	<p style="text-align: center;">12</p> <p>1 quickly yesterday.</p> <p>2 Q. And are you aware then, sir, that the</p> <p>3 State of New York actually permitted businesses to</p> <p>4 reopen and have staff to return in June of 2020?</p> <p>5 A. I was not.</p> <p>6 Q. Okay. So in regards to your statement</p> <p>7 that most businesses were not permitting people to</p> <p>8 return --</p> <p>9 A. I just -- most businesses were not</p> <p>10 requiring people to go to the office.</p> <p>11 Q. Right. But you were not aware that the</p> <p>12 Governor had actually advanced the State into I</p> <p>13 believe it was Phase 3 permitting offices to reopen</p> <p>14 and people to return to work, correct?</p> <p>15 A. I was not. That being -- that being</p> <p>16 said, most people in white collar jobs that I know</p> <p>17 are not going to work now. It's starting to change</p> <p>18 in the last month or two I would say, but many of my</p> <p>19 friends, partners at major accounting and law firms</p> <p>20 and investment banks, are not going to work still.</p> <p>21 Q. That may be the case, sir, but I think</p> <p>22 we're -- we're more concerned about what the State of</p> <p>23 New York is permitting here and not your anecdotal</p> <p>24 opinion with due respect, and the fact that you -- I</p> <p>25 appreciate your candor having not been aware of that</p>

	25		27
1 Q.	Throughout the past year and a half?	1 Q.	Okay. Thank you. But if you want to
2	MS. SELIGER: Objection.	2	look at Exhibit 3, Dr. Katz, just so you understand
3 A.	I did not -- I did not know that.	3	at page two plaintiff identified you as an individual
4 Q.	Do you believe that he would be at risk	4	who may have discoverable information concerning
5	based upon your earlier statements as a result of	5	specifically, Dr. Katz may have knowledge concerning
6	being unmasked in a public pool?	6	plaintiff's underlying health conditions.
7	MS. SELIGER: Objection. What is the	7	That's where I reviewed --
8	question?	8 A.	Thank you. But that's -- okay.
9 A.	What do I do now? Can I answer?	9 Q.	Now, I'm not going to quibble with you.
10 Q.	Of course. As I instructed you before,	10	With due respect, I don't think you know the
11	she can object but you can always answer over the	11	difference between fact and opinion under The Federal
12	objection unless she instructs you not to answer it.	12	Rules of Evidence, so I just would ask to proceed
13 A.	Yeah. I think if it's a public --	13	here that we just advance the ball since you do seem
14	THE WITNESS: Leah, can I answer?	14	to be having fun, like you said, we can save a lot of
15	MS. SELIGER: I would just want to	15	time.
16	state, Josh, so that Dr. Katz knows if you --	16 A.	Go-go-go-go. Let's go.
17	MR. BAUCHNER: No. Ms. Seliger, there's	17 Q.	Thank you. Has plaintiff since you
18	no speaking objections. This is my record, so you're	18	wrote this June 3rd letter we've marked as Exhibit 5
19	not going to state anything for Dr. Katz to know,	19	consulted with you concerning any of the safety
20	please. You levied an objection, and Dr. Katz can	20	protocols that the employer implemented?
21	now answer. That's all. Please.	21 A.	He has not asked again.
22	MS. SELIGER: If he understands the	22 Q.	Okay. Did he consult with you -- I
23	question.	23	apologize if I asked this before -- did he consult
24	MR. BAUCHNER: Dr. Katz was prepared to	24	with you prior to electing to swim unmasked?
25	answer the question until you interrupted him.	25 A.	No.
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	26		28
1 Q.	Dr. Katz, please proceed.	1 Q.	Did he consult with you prior to
2 A.	I would say if -- there is risk if he is	2	electing to go for walks in public parks where there
3	hanging out in a -- if he's seeing other people close	3	are other people?
4	on without a mask, yeah.	4 A.	No.
5 Q.	Such as swimming unmasked in a public	5 Q.	Okay. Thank you. If you'll turn now,
6	pool, correct?	6	Doctor, to Exhibit 6.
7 A.	I don't know about the swimming part but	7 A.	Yeah.
8	the preparation for swimming.	8 Q.	And are these the notes to which you've
9 Q.	And what about walking in public parks,	9	been referring, sir?
10	for example --	10 A.	Yep. They are.
11	MS. SELIGER: Objection.	11 Q.	Okay. Plaintiff has alleged, sir, that
12	-- would that place him at risk?	12	he has an underlying heart condition which exposes
13 A.	There's an amazing amount of opinion	13	him to higher risk of COVID.
14	here, Josh, for somebody who's not getting paid. I'm	14	Are you aware of that heart condition,
15	enjoying it so I'll keep -- I mean none of this is	15	sir?
16	facts, right? You're paying me to be a fact witness?	16 A.	He has -- I mean he has mild coronary
17 Q.	No, Dr. Katz. I'm not going to quibble	17	artery -- I shouldn't use the word mild, but he has
18	with you about the law. You're mistaken. I will	18	coronary artery disease but not -- I would say not
19	tell you, though, for the record if you'll turn to	19	significant.
20	Exhibit-3.	20 Q.	And would it create a higher risk for
21 A.	Yeah. I don't -- I think walking in a	21	him for COVID?
22	public park if there are a lot of people within a	22 A.	I mean, again, if you put together his
23	short distance of him within a few -- within probably	23	age with his weight, with his wife's condition, with
24	-- I guess what's set at six feet, and they're not	24	some mild coronary disease, I think all that together
25	masked he probably is at some increased risk.	25	given the fact at least at that time that there was
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<p>29</p> <p>1 no vaccine would put him at high risk for coronary 2 disease, correct.</p> <p>3 Q. And once the vaccine was in place, sir, 4 would that enable the plaintiff to return to work 5 with the safety protections we previously discussed 6 in place?</p> <p>7 A. I think it mitigates the --</p> <p>8 MS. SELIGER: Objection. Speculation.</p> <p>9 Q. Thank you. Where does in this report, 10 sir, just on page one where it says, cardiovascular, 11 it says, negative for chest pain, claudication, 12 dizziness, orthopnea, palpitations and pedal edema.</p> <p>13 A. Edema.</p> <p>14 Q. Excuse me. Edema. Where does it 15 address this mild cardiological issue you just 16 referenced, sir?</p> <p>17 A. So I'm looking back at the past medical 18 history. I mean that day he didn't complain of chest 19 pain or any of those cardiac complaints, but in the 20 medical history I tend to have an ongoing record of 21 what his past was like.</p> <p>22 Q. And that entry, sir, on 9/12 is that 23 September of 2012?</p> <p>24 A. Where are you?</p> <p>25 Q. I'm in the past medical history. DENISE SWEET & ASSOCIATES, LLC</p>	<p>31</p> <p>1 page from the exhibit that would be helpful, please.</p> <p>2 A. Sorry. I just lost it. Where did it 3 go? I'm on Exhibit 6?</p> <p>4 Q. Yes, sir.</p> <p>5 A. I don't know how I lost that. Hold on. 6 I'm pretty sure he came -- one second. I'm looking. 7 I'm looking. October 7, 2020.</p> <p>8 Q. And for the record while you're looking, 9 Dr. Katz, plaintiff testified that he, in fact, did 10 not visit you in or around June 3rd, 2020 when the 11 note you issued was drafted.</p> <p>12 A. I couldn't remember how it -- I'll tell 13 you what I tend to do with these notes. I thought he 14 came in to discuss it. I'm looking at it. Honestly 15 I don't see a note with it. I tend to add -- when 16 patients want letters like this, I tend to ask them 17 to write a letter, and then I tend to change it -- I 18 have no -- I tend to change it to make it look 19 exactly the way I want it to look. That's what I 20 usually do just because you get endless letters like 21 this. Usually they don't end up in court cases, but 22 I thought he came in and brought it to me. I 23 could -- maybe -- I don't think he e-mailed me but 24 I'll look. I think he might have mailed it. I don't 25 remember how I got it, and I remember -- I think I DENISE SWEET & ASSOCIATES, LLC</p>
<p>30</p> <p>1 A. Yes. Yes. Yes. I don't know -- I'm 2 not sure why that's not updated, but I don't see it 3 updated.</p> <p>4 Q. Okay. So does the past medical history 5 reflect this mild cardiological condition you 6 referenced?</p> <p>7 A. I mean what I have written here is that 8 he -- what's written in the past medical history is 9 just that he had mild disease potentially on an 10 angiogram in 2009 I believe, and then there's not 11 that much more -- I mean it doesn't sound like that's 12 a big part of his medical risk factors.</p> <p>13 Q. Okay. Do you have a record --</p> <p>14 A. This is -- oh, sorry, so this note is 15 from 2016.</p> <p>16 Q. Yeah.</p> <p>17 A. Oh, sorry. That's why it's not updated. 18 I apologize.</p> <p>19 Q. Sure. That's quite all right. We're 20 going to go through the rest.</p> <p>21 So -- and you have them before you. 22 They're from your records, again. Do you looking 23 through Exhibit 6 have a record of the consultation 24 with the plaintiff in or around June of 2020 that you 25 reference took place? And if you can just refer to a DENISE SWEET & ASSOCIATES, LLC</p>	<p>32</p> <p>1 changed it. I don't know. I have to look but it's 2 not in -- you don't have it in the -- you don't have 3 a document anywhere in the chart that has -- you 4 wouldn't know from that I guess. I don't know. I'm 5 not sure.</p> <p>6 Q. Okay. So do you have any record, Dr. 7 Katz, of plaintiff visiting you in or around June 3rd 8 of 2020 for a consult related to your letter 9 Exhibit 5?</p> <p>10 A. It doesn't look like it.</p> <p>11 Q. Okay. And if I understood your 12 testimony just now, sir, the plaintiff would have 13 provided you with an initial draft of Exhibit 5; is 14 that correct?</p> <p>15 MS. SELIGER: Objection. Speculation.</p> <p>16 A. Yes. I -- I often do things like that. 17 I don't know if I did it here. I really don't -- I 18 can't recall exactly what happened with the -- I know 19 that's -- I guess that's why you want my e-mails. I 20 don't think it was in there. I tried to look 21 quickly. I didn't look at all of them.</p> <p>22 Q. Okay. Well, in reading Exhibit 5, does 23 that -- is that your letterhead?</p> <p>24 A. I'm sorry. Go back. Exhibit 5 is the 25 letter?</p> <p>DENISE SWEET & ASSOCIATES, LLC</p>

	53		55
1	e-mail, sir?	1	you have records of your telephone consultations,
2	A. Yes.	2	correct?
3	MS. SELIGER: Why don't you read it, so	3	A. I did not document anything.
4	we all are looking at the same thing.	4	Q. Okay. Thank you. So you have no record
5	Q. The e-mail begins, the UTD was resolved	5	of any communication with Mr. Goldman in or around
6	by completion of the prescription.	6	May 28th, 2020, correct, other than this e-mail?
7	Do you see that, Doctor?	7	A. Correct.
8	A. Yeah. I have it.	8	Q. Thank you. Doctor --
9	Q. Okay. And the e-mail continues, my	9	I just want to make sure it's not in
10	employer is going to gradually open probably in about	10	another -- okay. Keep going. I'm listening to you.
11	two weeks. I anticipate that I will be expected to	11	I'm just trying -- I'm just checking my e-mail list
12	return at some point. Cheryl and I have been	12	just to see if there's any other ones. I don't think
13	strongly quarantined. I have rarely left the house.	13	so.
14	I would greatly appreciate it if you can provide me	14	Q. Dr. Katz, we're going to I think adjourn
15	with a very strong emphatic letter that states that I	15	for the day. We will reserve --
16	have been your patient for many years, and it is your	16	MS. SELIGER: I need to ask --
17	strong medical opinion that I cannot return to work	17	MR. BAUCHNER: Okay. I'm okay to speak.
18	in the office in New York City or the courts in New	18	Q. We're going to reserve our rights to
19	York City due to a number of underlying health	19	recall you, sir, as you know, but if counsel wants to
20	issues. Either they will terminate my employment and	20	ask you some questions she should feel free to do so
21	I will file for unemployment, or I will retire	21	at this time.
22	depending on discussions with them. If you have any	22	
23	questions I can e-mail -- reached by e-mail or at,	23	CROSS EXAMINATION BY MS. SELIGER:
24	and then there's a cellphone number I won't put in	24	Q. Okay. Dr. Katz, I just have a few
25	the record.	25	questions.
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	54		56
1	Do you recall receipt of that e-mail,	1	I'm going to direct your attention,
2	sir?	2	again, to Exhibit 5 that was presented by defendants,
3	A. Yeah.	3	that was your June 3rd, 2020 letter?
4	Q. And that language appears to be the	4	A. Okay.
5	basis for your letter of June 5th, correct?	5	Q. Do you know which letter?
6	A. Yeah.	6	A. Yeah. I have it.
7	Q. In fact, much of that language was	7	Q. Okay. When you signed that letter, did
8	incorporated into your letter, correct, sir?	8	you believe the statements made in the letter were
9	A. Yeah.	9	true?
10	Q. And for the record there was no further	10	A. 100 percent.
11	consultation with plaintiff at that time, correct?	11	Q. Was there a vaccine for COVID-19 in June
12	A. I -- I must have spoken to him about the	12	of 2020 when you signed the letter?
13	letter, and then I must have adapted. I don't see I	13	A. Nope. Actually I looked up the other
14	have a record of that. But I would assume I did. I	14	day just because I knew this case was coming. I
15	mean I --	15	think the vaccine first came out in December of 2020.
16	Q. Sure. And, Doctor, you produced your	16	Q. Were there conditions widely accepted by
17	telephonic notations, right? Your records of those	17	doctors at the time as causing certain people to be
18	telephone consultations, correct?	18	more at risk if they contracted COVID-19?
19	A. Yeah.	19	MR. BAUCHNER: Objection to form.
20	Q. And there's no indication of a	20	A. Can I answer?
21	consultation with Mr. Goldman in or around May 28th,	21	Q. Yes.
22	2020, correct?	22	MR. BAUCHNER: Yes.
23	A. I think it -- I think it must have been	23	A. Yeah. For sure there were.
24	by telephone.	24	Q. Did you believe your patient Jeff
25	Q. Doctor, if I understood you correctly,	25	Goldman had one or more of those risk factors?
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